

PUBLIC SERVICE COMMISSION

Complaint Of Core Communications,)
Inc. Against Verizon Maryland Inc.)
For Breach Of An Interconnection)
Agreement And Request For) Case No. 8881
Immediate Relief)

AFFIDAVIT OF DIANNE MCKERNAN

My name is Dianne McKernan. My business address is 1 Washington Park, Newark, NJ 07102. I am an Account Manager for Wholesale Markets.

As a specialist in Verizon Wholesale Services, I began working with North County Communications ("NCC") in December of 2000. I was subsequently assigned as the Account Manager for NCC in April of 2001.

It is my understanding that the interconnection agreement between North County Communications and Verizon - West Virginia became effective on January 19, 2001.

On January 24, 2001, I set up an initial conference call with North County Communications to discuss the requirements for NCC's interconnection in West Virginia. I participated on the call on behalf of Verizon, along with other operations personnel. Mr. Todd Lesser participated on that call on behalf of NCC, along with an individual named "Dave," who Mr. Lesser introduced as someone he worked with. Not until the call was almost concluded did Mr. Lesser identify "Dave" as his attorney.

During the call, Mr. Lesser requested that Verizon use an existing outside plant multiplexing facility (in his words "entrance facility"), that was currently being used to serve Verizon retail customers, to provide NCC with interconnection. Mr. Lesser was advised that Verizon uses only dedicated entrance facilities for the installation of interconnection trunks with carriers. At that time, Mr. Lesser was given the option of leasing a dedicated entrance facility from Verizon or collocating at Verizon's central office for interconnection. Mr. Lesser insisted that Verizon use the third party's entrance facility to provide him interconnection.

In late February or early March of 2001, Mr. Lesser chose to have Verizon build a dedicated entrance facility for interconnection with Verizon. On March 7, 2001, Verizon initiated the build for the entrance facility at NCC's premises in Charleston, WV.

North County's entrance facility construction in Charleston, WV was completed on July 31, 2001.

Prior to completion of the entrance facility build, Mr. Lesser urgently requested that Verizon activate interconnection trunks so that he would not lose his NXX codes. It is my understanding from Mr. Lesser, that Neustar (the 3rd party NXX Code Administrator) would reclaim his NXX codes on July 31, 2001 unless North County had at least one (1) T1 transport facility and associated DS0 trunks turned-up as soon as possible. As a courtesy to Mr. Lesser, Verizon redesigned one (1) T1 trunk group (24 DS0's) on alternate facilities. This was done with the understanding that as soon as NCC's entrance facility was complete, this traffic would be migrated to the dedicated ring. This was in no way a permanent arrangement, and was done only as a favor to Mr. Lesser so that he would not lose his NXX codes. Verizon was in no way obligated to provide this service, but did so as a professional courtesy. All of the

remaining initial (start-up) interconnection trunks are being provisioned over the dedicated ring.

Verizon did not unnecessarily delay North County Communications in establishing interconnection in West Virginia. Furthermore, it did not take Verizon over a year to provision entrance facility interconnection to NCC in Charleston, WV. Rather, Verizon completed the entrance facility build and interconnection for NCC in a few days over 6 months after the initial conference call with Mr. Lesser.

I hereby declare under oath and penalty of perjury that the foregoing Affidavit is true and correct to the best of my knowledge.

Dianne McKernan

Subscribed and sworn to before me this 5th day of October, 2001.

Notary Public